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POLICE CHIEF JIM MCDONNELL

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

LOS ANGELES PRESS CLUB,
STATUS COUP,

Plaintiffs,

vs.

CITY OF LOS ANGELES, a municipal
entity, JIM MCDONNELL, LAPD
CHIEF, sued in his official capacity;

Defendants.

CASE NO. 25-CV-05423 HDV-E

**DECLARATION OF LIEUTENANT
JASMIN GOMEZ IN OPPOSITION
TO PLAINTIFFS' MOTION FOR
PRELIMINARY INJUNCTION**

1 I, JASMIN GOMEZ, declare:

2 1. I am employed by the City of Los Angeles as a Lieutenant II with the Los
3 Angeles Police Department (“LAPD”). My current assignment is with the LAPD Risk
4 Management and Legal Affairs Division. I submit this declaration in opposition to
5 Plaintiffs’ motion for preliminary injunction. If called to testify, I could and would
6 competently do so of my own personal knowledge.

7 2. One of my duties is to assist the attorneys handling civil litigation matters on
8 behalf of the LAPD with obtaining materials from the LAPD, including sharing with
9 attorneys videos and documents from the computer servers which store that information.

10 3. In this matter, I assisted with obtaining and sharing the LAPD officers’ Body
11 Worn Videos maintained by the LAPD related to this matter.

12 4. When an LAPD officer records video with his or her Body Worn Video, that
13 video is uploaded to a server where it is maintained. In my capacity as a Lieutenant II
14 with the LAPD, I have access to the Body Worn Video that is uploaded to the server.

15 5. For this matter, I accessed the Body Worn Videos maintained on the LAPD
16 server, and which are being submitted as exhibits in support of Defendants’ Opposition to
17 Plaintiffs’ Motion for Preliminary Injunction. True and correct copies of these videos are
18 being submitted with a separate Notice of Lodging.

19 6. **Exhibit A** is a true and correct copy of LAPD Officer Moreno’s body worn
20 camera footage captured on June 19, 2025

21 7. **Exhibit C** is a true and correct copy of LAPD Officer Dameworth’s body
22 worn camera footage captured on June 8, 2025.

23 8. **Exhibit H** is a true and correct copy of LAPD Officer Chu’s body worn
24 camera footage captured on June 8, 2025.

25 9. **Exhibit J** is a a true and correct copy of LAPD Officer Lopez’s body worn
26 camera footage captured on June 8, 2025.

27 10. **Exhibit K** is a true and correct copy of LAPD Officer Del Papa’s body worn
28 camera footage captured on June 9, 2025.

1 11. **Exhibit L** is a true and correct copy of LAPD Officer Zambrano's body
2 worn camera footage captured on June 9, 2025.

3 12. **Exhibit M** is a true and correct copy of LAPD Officer Sanchez's body worn
4 camera footage captured on June 9, 2025.

5 13. **Exhibit N** is a true and correct copy of LAPD Officer Costello's body worn
6 camera footage captured on June 9, 2025.

7 14. **Exhibit O** is a true and correct copy of LAPD Officer Nam's body worn
8 camera footage captured on June 10, 2025.

9 15. **Exhibit P** is a true and correct copy of LAPD Officer Lankford's body worn
10 camera footage captured on June 10, 2025.

11 16. **Exhibit Q** is a true and correct copy of LAPD Officer Messaoudi's body
12 worn camera footage captured on June 14, 2025.

13 17. **Exhibit R** is a true and correct copy of LAPD Officer Polen's body worn
14 camera footage captured on June 14, 2025.

15 18. **Exhibit S** is a true and correct copy of LAPD Officer Soria's body worn
16 camera footage captured on June 14, 2025.

17 19. **Exhibit T** is a true and correct copy of LAPD Officer Castellon's body worn
18 camera footage captured on July 4, 2025.

19 20. **Exhibit U** is a true and correct copy of LAPD Officer Lancaster's body
20 worn camera footage captured on July 4, 2025.

21 21. **Exhibit V** is a true and correct copy of LAPD Officer Bueno's body worn
22 camera footage captured on June 10, 2025.

23 22. **Exhibit W** is a true and correct copy of LAPD Officer Newsome's body
24 worn camera footage captured on June 11, 2025.

25 23. **Exhibit X** is a true and correct copy of LAPD Officer Saephanh's body
26 worn camera footage captured on June 11, 2025.

27 24. **Exhibit Y** is a true and correct copy of LAPD Officer Copeland's body
28 worn camera footage captured on June 14, 2025.

1 25. Paragraph 44 of Adam Rose's July 2, 2025 declaration (Dkt. 19) states that a
2 camera operator for ABC News Australia was shot in the chest with an LLM on June 10.
3 The declaration admits the ABC crew did not identify who fired the LLM. Officers in
4 Risk Management and Legal Affairs Division were unable to locate any LAPD personnel
5 present at the location at the day and time referenced in paragraph 44.

6 26. From my review of documents prepared and maintained as part of ordinary
7 LAPD policy and procedure that I have access to as a Lieutenant II, Officers responding
8 to the protests were specifically reminded of the Department's use of force policies,
9 crowd control policies, the *Crespo* settlement, and Cal. Penal Code § 409.7.

10 27. **Exhibit Z** is a true and correct copy of LAPD Officer Corona's body worn
11 camera footage captured on June 8, 2025.

12 28. **Exhibit AA** is a true and correct copy of LAPD Officer Daughtry's body
13 worn camera footage captured on June 14, 2025.

14 29. **Exhibit BB** is a true and correct copy of LAPD Officer Olmos's body worn
15 camera footage captured on June 14, 2025.

16 30. **Exhibit CC** is a true and correct copy of LAPD Officer Cardona's body
17 worn camera footage captured on June 8, 2025.

18 31. **Exhibit DD** is a true and correct copy of LAPD Officer Fiallos's body worn
19 camera footage captured on June 8, 2025.

20 32. **Exhibit EE** is a true and correct copy of LAPD Sergeant De Anda's body
21 worn camera footage captured on June 14, 2025.

22 33. **Exhibit FF** is a true and correct copy of LAPD Lieutenant Dunster's body
23 worn camera footage captured on June 14, 2025.

24 34. **Exhibit GG** is a true and correct copy of LAPD Officer Johnson's body
25 worn camera footage captured on June 11, 2025.

26 35. **Exhibit HH** is a true and correct copy of LAPD Officer Bryant's body worn
27 camera footage captured on June 11, 2025.
28

1 36. **Exhibit II** is a true and correct copy of LAPD Officer Rivera's body worn
2 camera footage captured on June 11, 2025.

3 37. **Exhibit JJ** is a true and correct copy of LAPD Officer Alvarez's body worn
4 camera footage captured on June 8, 2025.

5 38. **Exhibit KK** is a true and correct copy of LAPD Officer Driller's body worn
6 camera footage captured on June 14, 2025.

7 39. **Exhibit LL** is a true and correct copy of LAPD Officer Machado's body
8 worn camera footage captured on June 8, 2025.

9 40. **Exhibit MM** is a true and correct copy of LAPD Officer Peraza's body
10 worn camera footage captured on June 8, 2025.

11 41. **Exhibit NN** is a true and correct copy of LAPD Officer Delgadillo's body
12 worn camera footage captured on June 8, 2025.

13 42. **Exhibit OO** is a true and correct copy of LAPD Officer Schneider's body
14 worn camera footage captured on June 8, 2025.

15 43. **Exhibit PP** is a true and correct copy of LAPD Officer Ortiz's body worn
16 camera footage captured on June 8, 2025.

17 44. **Exhibit QQ** is a true and correct copy of LAPD Officer Balbuena's body
18 worn camera footage captured on June 8, 2025.

19 45. **Exhibit RR** is a true and correct copy of LAPD Officer Copeland's body
20 worn camera footage captured on June 11, 2025 in regard to the De Frias incident.

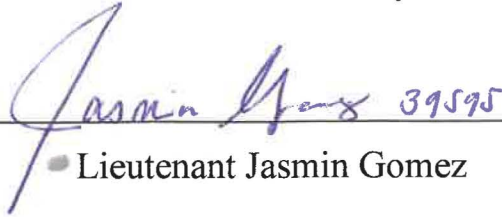
21 46. **Exhibit SS** is a true and correct copy of LAPD Officer Johnson's body worn
22 camera footage captured on June 11, 2025 in regard to the De Frias incident.

23 47. **Exhibit TT** is a true and correct copy of LAPD Officer Campos's body
24 worn camera footage captured on June 8, 2025.

25 48. **Exhibit UU** is a true and correct copy of LAPD Officer Muro's body worn
26 camera footage captured on June 8, 2025.

27 49. **Exhibit VV** is a true and correct copy of LAPD Officer Christensen's body
28 worn camera footage captured on June 8, 2025.

1
2 I declare under penalty of perjury under the laws of the United States of America
3 that the foregoing is true and correct. Executed this 18th day of August, 2025, in Los
4 Angeles, California.

5  39595
6 Lieutenant Jasmin Gomez
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